

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of its 2016 Rate Design Window Proposals.

Application 16-09-003

**DECISION GRANTING COMPENSATION TO THE AGRICULTURAL ENERGY CONSUMERS ASSOCIATION FOR SUBSTANTIAL CONTRIBUTION TO
DECISION 18-07-006**

Intervenor: Agricultural Energy Consumers Association	For contribution to Decision (D.) 18-07-006
Claimed: \$26,609.92	Awarded: \$26,752.48 ^[3]
Assigned Commissioner: Marybel Batjer	Assigned ALJ: Stephen C. Roscow

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.18-07-006 addresses the application of Southern California Edison Company (SCE) for approval of its 2016 Rate Design Window (RDW) proposals to revise the time-of-use (TOU) periods and seasons, implement Critical Peak Pricing (CPP) for certain customers, and revise real-time-pricing (RTP) rates.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	December 8, 2016	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	January 9, 2017	Verified
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.17-06-015	Verified
6. Date of ALJ ruling:	December 4, 2017	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.17-06-015	Verified
10. Date of ALJ ruling:	December 4, 2017	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.18-07-006	Verified
14. Date of issuance of Final Order or Decision:	July 13, 2018	Verified
15. File date of compensation request:	September 11, 2018	Verified
16. Was the request for compensation timely?		Yes

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
	<p>In multiple decisions over the past two decades (<i>see, e.g.</i>, D.95-07-093; D.96-08-040; D.96-11-048; D.02-06-014; D.03-09-067; D.06-04-065; D.13.02-019; D.13-02-019; D.14-12-069; D.15-12-014) and most recently in D.16-08-013, the Commission has found that AECA represents individual farmers who have annual electricity bills of less than \$50,000, and that members' economic interest has been considered small in comparison to the costs of participation. Pursuant to the additional guidance provided by the ALJ in the December 4, 2017 Ruling issued in R.17-06-015 on AECA's Showing of Significant Financial Hardship, AECA provides information on the percentage of AECA membership who are agricultural customers with annual electric bills below \$50,000. For purposes of this proceeding, AECA currently has 280 active individual members (excluding agricultural associations and water district members); 178 of those members have electricity bills of less than \$50,000. As a result, AECA is seeking 64% ($178 \div 280$) of the total compensation found reasonable in this proceeding.</p>	Noted

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. AECA was an active party in the proceeding and settlement discussions, including filing opening testimony, a response on SCE's motion to strike portions of AECA's testimony, and comments on the Proposed Decision, and negotiating and executing a Joint Stipulation.</p> <p>"Opening testimony was served on April 28, 2017, by...Agricultural Energy Consumers Association..."</p> <p>"On August 7, 2017 SCE filed and served several stipulations: [including] SCE-Agricultural Parties Joint Stipulation Resolving Issues in SCE 2016 RDW Proceeding (Exhibit SCE-CFBF-AECA-1);" AECA is a party to the Joint Stipulation.</p> <p>"On June 1, 2017 SCE filed a motion to strike portions of the testimony of the Agricultural Energy Consumers Association (AECA)...parties filed responses to the June 1, 2017 motion on ... June 16, 2017 (AECA and SEIA)." The motion to strike was granted in part and denied in part.</p> <p>"Comments [on the PD] were filed on June 11, 2018 by SCE, ORA, CLECA, AECA and Farm Bureau (jointly)..."</p>	<p>D.18-07-006, p. 5.</p> <p>D.18-07-006, p. 6.</p> <p>ALJ's Ruling on Motions to Strike, August 9, 2017, pp. 1-2, 10-11.</p> <p>D.18-07-006, p. 87.</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>
2. AECA proposed that rate	Exh. AECA-1, p. 2-4.	Verified

<p>design changes should be deferred until SCE's next GRC.</p> <p>"The PD should be revised to provide flexibility for implementation of the new TOU periods to allow for simultaneous implementation with the new GRC Phase 2 Rates."</p> <p>"SCE agrees to propose and support not implementing the TOU periods adopted in this proceeding until rate options proposed in A.17-06-030 are adopted and implemented including the rate options specifically designed for Agricultural and Pumping Customers."</p> <p><u>Decision:</u> "[W]e have modified the PD to provide that the rates and tariff modifications approved in this decision should take effect no sooner than February 1, 2019 and shall be implemented simultaneously with any rate changes adopted in SCE's GRC Phase 2 proceeding."</p>	<p>Comments of the California Farm Bureau Federation and Agricultural Energy Consumers Association on Proposed Decision of Administrative Law Judge Roscow (Joint Ag Parties Comments on PD), June 11, 2018, pp. 2-3.</p> <p>SCE-CFBF-AECA-1, p. 2.</p> <p>D.18-07-006 pp. 65, 88</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p>
<p>3. The proposed TOU periods would make it very difficult for farmers to respond based on the unique characteristics of agricultural operations.</p> <p>"Farmers would find it quite challenging, if not impossible, to change their electricity patterns in response to these new periods. Having to wait</p>	<p>Exh. AECA-1, p. 17-19.</p> <p>Exh. AECA-1, p. 18.</p>	<p>Verified</p> <p>Verified</p>

<p>until 9:00 p.m. to turn on irrigation systems means that farm workers would have to work in the dark to comply with the new pricing periods, creating safety hazards. They would be unable to check for system leaks and breaks at night.”</p> <p><u>Joint Stipulation:</u></p> <p>“...SCE and the Ag Parties agree to begin discussions no late than September 2017 to devise rate options that directly address the Agricultural and Pumping class’ unique characteristics and constraints, including the consideration of rate options in light of the fact that deployment of farm labor is typically limited by the availability of sunlight as well as the need to start the day at sunrise.”</p>	<p>Exh. SCE-CFBF-AECA-1, p. 2.</p>	<p>Verified</p>
<p>4. AECA proposed that agricultural customers be allowed to remain on existing TOU periods for a period of time.</p> <p>“[T]he CPUC should allow agricultural customers who have shifted their loads away existing peak periods to remain on rate schedules that reflect the same periods and cost differentials for up to 10 years... .”</p> <p><u>Joint Stipulation:</u></p>	<p>Exh. AECA-1, pp. 13-19.</p> <p>Exh. AECA-1, p. 14.</p>	<p>Verified</p> <p>Verified</p>

<p>“The parties anticipate that design elements to be reflected in rate options that address farm needs may include the use of different rate differentials as compared to other rate groups.”</p>	<p>Exh. SCE-CFBF-AECA-1, p. 2.</p>	
<p>5. AECA proposed that Critical Peak Pricing (CCP) to be voluntary, not mandatory, for TOU-PA-3 customers.</p> <p>“SCE’s proposal to implement default critical peak pricing (CPP) rates for larger agricultural accounts on the TOU-PA-3 tariff is ill-advised. Instead, the Commission should permit customers to voluntarily elect to participate in this tariff as their specific circumstances allow.”</p> <p><u>Joint Stipulation:</u></p> <p>“SCE agrees to support extending its “alternative” proposal (<i>i.e.</i>, Critical Peak Pricing (CPP) being offered as an optional rather than default rate) to TOU-PA-3 customers.”</p> <p><u>Decision:</u></p> <p>“[W]e deny <i>without prejudice</i> SCE’s alternative proposal to offer CPP as an optional rather than a default rate to customers on its TOU-GS-1 and TOU-PA-3 rate schedules.” (Emphasis added.) The Commission’s determination</p>	<p>Exh. AECA-1, pp. 19-21.</p> <p>Exh. AECA-1, p. 19.</p> <p>Exh. SCE-CFBF-AECA-1, p. 2.</p> <p>D.18-07-006, pp. 67-68.</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p> <p>Verified</p>

was based largely on procedural considerations. It evaluated AECA's and SCE's CPP proposals for agriculture, and did not reject them on substantive grounds.		
6. SEIA suggests in testimony that October become a "summer" month.	Exh. SEIA-1, pp. i-iii, 7-13, and 28-31; SEIA Comments on PD, pp. 2, 8-10; SEIA Reply Comments on PD, pp. 1-4.	Verified
<u>Joint Stipulation:</u> "Ag Parties agree to support SCE's seasonal and day type definitions."	Exh. SCE-CFBF-AECA-1, p. 2.	Verified
<u>Decision:</u> "Based on our review of the record and comments and reply comments on the PD filed and served by SEIA, SCE and CLECA, we see no reason to change the determination in the PD that October should remain part of the winter season in SCE's territory."	D.18-07-006, p. 38.	Verified

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: California Farm Bureau Federation		Verified

² The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

(CFBF)	
<p>d. Intervenor’s claim of non-duplication: AECA and CFBF have historically submitted separate testimony in CPUC proceedings, raising distinct, non-duplicative issues. During settlement negotiations the two agricultural groups coordinated efforts. While both parties seek reasonable outcomes for agricultural customers, AECA highlighted the flawed underlying cost modeling used to justify TOU rate structures, sought grandfathered TOU periods, and offered other options to help minimize the impact on agricultural customers. AECA’s involvement led directly to the agreements outlined in the Joint Stipulation, which allowed for many of AECA’s (and CFBF’s) issues to be addressed in SCE’s Phase 2 GRC. AECA’s active participation and expertise in Agricultural Rate Design issues directly led to reduced adverse impacts on the agricultural class and more appropriate considerations for the unique characteristics of agricultural energy use.</p> <p>AECA’s efforts to avoid duplication with other parties and dedicated pursuit of important issues should be recognized by the Commission.</p>	Verified

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>AECA’s requests an intervenor compensation award of \$26,609.92 (\$41,578.00 x .64). The requested award is reasonable in light of the benefits achieved through AECA’s participation in the proceeding. AECA’s efforts to secure rate design elements unique to the Agricultural and Pumping Class will help farmers adjust to new TOU rates while minimizing bill impacts to customers. The Joint Stipulation directly led to elements being included in the SCE GRC Phase 2 that recognize the unique characteristics of agricultural energy use and grower’s ability to shift load. Finally, AECA diligently worked to avoid duplication of effort with other parties.</p>	Verified
<p>b. Reasonableness of hours claimed:</p> <p>AECA’s request is reasonable in light of the scope of the proceeding and the length and complexity of negotiations. AECA’s requested amount is far below its NOI estimate of about \$48,000. The reduced amount reflects AECA’s efforts to effectively manage participation costs. AECA is not seeking travel or other costs of participation. In addition, AECA relied on well-priced economic experts to conduct research, review date responses and conduct bill impact analysis and rate design scenarios, thereby minimizing attorney fees and further keeping costs in check. Ultimately, this proceeding was fully litigated, however, AECA was able to</p>	Verified

<p>resolve issues through agreement with SCE and CFBF, as reflected in the Joint Stipulation. While the timing of this agreement didn't allow for avoidance of all attorney participation costs, it did avoid significant costs for participation in evidentiary hearings. The discussions leading up to the Joint Stipulation were complex and lengthy given the magnitude and complexity of the issues under discussion.</p> <p>AECA submitted comprehensive testimony documenting the unique intricacies associated with SCE's proposals for Agricultural and Pumping customers. The ultimate agreement in the Joint Stipulation recognized exactly what AECA demonstrated in testimony – that agricultural operations should receive separate consideration because of the complicated nature of agricultural energy use.</p> <p>AECA submits that documented hours claimed are reasonable, both for each attorney and expert individually, and in the aggregate, and AECA respectfully asks that this request be granted.</p>	
<p>c. Allocation of hours by issue: Hours are allocated by issue as follows (see Excel spreadsheet for further detail):</p> <p>General Policy: 5.25 / 3%</p> <p>Rate Design: 43.50 / 24%</p> <p>TOU Periods: 78.50 / 43%</p> <p>Seasonal Definitions: 21.50 / 12%</p> <p>Critical Peak Pricing: 35.40 / 19%</p> <p>Totals: 184.15 / 101%</p> <p>(Note: Extra % due to rounding; see Excel spreadsheet for detail)</p>	Verified

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ann L. Trowbridge	2016	0.6	\$405.00	D.16-18-013, ALJ-345 and ALJ-352	\$243.00	0.6	\$410 ³	\$246.00
Ann L. Trowbridge	2017	11.9	\$410.00	D.16-18-013, ALJ-345 and ALJ-352	\$4,879.00	11.9	\$420 ⁴	\$4,998.00

³ See D.16-08-013⁴ Application of Res. ALJ-345 – 2.14% Cost of Living Adjustment

Ann L. Trowbridge	2018	2.4	\$415.00	D.16-18-013, ALJ-345 and ALJ-352	\$ 996.00	2.4	\$430 ⁵	\$1,032.00
Ralph R. Nevis	2017	6.5	\$400.00	ALJ-345 and ALJ-352	\$2,600.00	6.5	\$400	\$2,600.00
Richard McCann	2016	13	\$210.00	D.16-18-013, ALJ-345 and ALJ-352	\$2,730.00	13	\$215 ⁶	\$2,795.00
Richard McCann	2017	24.75	\$215.00	D.16-18-013, ALJ-345 and ALJ-352	\$5,321.25	24.75	\$220 ⁷	\$5,445.00
Steven Moss	2016	9.5	\$215.00	D.16-18-013, ALJ-345 and ALJ-352	\$2,042.50	9.5	\$225 ⁸	\$2,137.50
Steven Moss	2017	19	\$215.00	D.16-18-013, ALJ-345 and ALJ-352	\$4,085.00	19	\$230 ⁹	\$4,370.00
Michael Boccadoro	2016	3.75	\$210.00	D.16-18-013, ALJ-345 and ALJ-352	\$ 787.50	3.75	\$215 ¹⁰	\$806.25
Michael Boccadoro	2017	34.25	\$215.00	D.16-18-013, ALJ-345 and ALJ-352	\$7,363.75	34.25	\$220 ¹¹	\$7,535.00
Michael Boccadoro	2018	6	\$215.00	D.16-18-013, ALJ-345 and ALJ-352	\$1,290.00	4.75 ^[1]	\$225 ¹²	\$1,068.75
Beth Olhasso	2016	3.75	\$155.00	D.16-18-013, ALJ-345 and ALJ-352	\$ 581.25	3.75	\$155	\$581.25
Beth Olhasso	2017	34.25	\$155.00	D.16-18-013, ALJ-345 and ALJ-352	\$5,308.75	34.25	\$160 ¹³	\$5,480.00
Beth Olhasso	2018	6	\$155.00	D.16-18-013, ALJ-345 and ALJ-352	\$ 930.00	5 ^[1]	\$165 ¹⁴	\$825.00

⁵ Application of Res. ALJ-352 – 2.30% Cost of Living Adjustment

⁶ Application of Res. ALJ-329 – 1.28% Cost of Living Adjustment to McCann's 2015 rate of \$210 established in D.16-08-013

⁷ Application of Res. ALJ-345 – 2.14% Cost of Living Adjustment

⁸ Application of Res. ALJ-329 – 1.28% Cost of Living Adjustment to Moss' 2015 rate of \$220 established in D.16-08-013

⁹ Application of Res. ALJ-345 – 2.14% Cost of Living Adjustment

¹⁰ See D.16-08-013

¹¹ Application of Res. ALJ-345 – 2.14% Cost of Living Adjustment

¹² Application of Res. ALJ-352 – 2.30% Cost of Living Adjustment

¹³ Application of Res. ALJ-345 – 2.14% Cost of Living Adjustment

¹⁴ Application of Res. ALJ-352 – 2.30% Cost of Living Adjustment

Subtotal: \$39,158.00						Subtotal: \$39,919.75		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Michael Boccadoro	2016	2.0	\$105.00	D.16-18-013, ALJ-345 and ALJ-352	\$ 210.00	1.6 ^[2]	\$107.50	\$172.00
Michael Boccadoro	2018	2.5	\$107.50	D.16-18-013, ALJ-345 and ALJ-352	\$ 268.75	2 ^[2]	\$112.50	\$225.00
Beth Olhasso	2016	4.0	\$77.50	D.16-18-013, ALJ-345 and ALJ-352	\$ 310.00	3.2 ^[2]	\$77.50	\$248.00
Beth Olhasso	2018	9.0	\$77.50	D.16-18-013, ALJ-345 and ALJ-352	\$ 697.50	7.2 ^[2]	\$82.50	\$594.00
Ann Trowbridge	2016	0.5	\$207.50	D.16-18-013, ALJ-345 and ALJ-352	\$ 103.75	0.3 ^[2]	\$205	\$61.50
Ann Trowbridge	2018	4.0	\$207.50	D.16-18-013, ALJ-345 and ALJ-352	\$ 830.00	2.7 ^[2]	\$215	\$580.50
Subtotal: \$2,420.00						Subtotal: \$1,881.00		
TOTAL REQUEST: \$41,578.00						TOTAL AWARD: \$41,800.75 ^[3]		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ¹⁵		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
Ann L. Trowbridge		December 1993		169591		No		
Ralph R. Nevis		November 1999		202730		No		

¹⁵ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

C. Attachments Documenting Specific Claim and Comments on Part III:
(attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	List of relevant AECA Submittals in A.16-09-003
3	Ralph Nevis Resume
4	Staff time records
Comment 1	AECA is not claiming any costs in this request. AECA has used electronic mail communication, phone and conference calls to reduce filing and meeting costs and keep overall costs to a minimum, further demonstrating the reasonableness of this claim.
Comment 2	Rationale for Ann Trowbridge's hourly rate: AECA is requesting an hourly rate of \$405 in 2016, \$410 in 2017, and \$415 in 2018 for Ms. Trowbridge. Ms. Trowbridge last received \$405 for work performed in 2016 (D.16-08-013). Her rate for 2017 and 2018 places her at the low end of the range for attorneys with 13-plus years of relevant experience (see Res. ALJ-345 and ALJ-352). Ms. Trowbridge graduated from University of the Pacific, McGeorge School of Law in 1993, and has practiced extensively before the Commission since the late 1990's.
Comment 3	Rationale for Ralph Nevis's hourly rate: AECA is requesting an hourly rate of \$400 in 2017. This rate places Mr. Nevis at the low end of the range for attorneys with 13-plus years of experience (see Res. ALJ-345 and ALJ-352). Mr. Nevis graduated from University of the Pacific, McGeorge School of Law in 1999, and has practiced before the Commission over the last ten years.
Comment 4	Rationale for Richard McCann's hourly rate: AECA is requesting an hourly rate of \$210 in 2016 and \$215 in 2017 for Dr. McCann. He last received \$210 for work performed in 2016 (D.16-08-013). His rates for 2016 and 2017 put him at the low end of the range for experts with 13-plus years of experience. Dr. McCann has over 20 years of experience in energy consulting.
Comment 5	Rationale for Steven Moss's hourly rate: AECA is requesting an hourly rate of \$215 in 2016 and 2017 for Mr. Moss. He last received \$215 for work performed in 2016 (D.16-08-013). His rates for 2016 and 2017 put him at the low end of the range for experts with 13-plus years of experience. Mr. Moss has over 20 years of experience in energy consulting.
Comment 6	Rationale for Michael Boccadoro's hourly rate: AECA is requesting an hourly rate of \$210 for in 2016 and \$215 in 2017 and 2018 for Mr. Boccadoro. He last received \$210 for work performed in 2016 (D.16-08-013). His rate of \$215 for 2017 and 2018 places him at the low end of the range for experts with 13-plus years of relevant experience (see Res. ALJ-345 and ALJ-352). He has over 20 years of experience as an energy policy and resource management expert.

Comment 7	Rationale for Beth Olhasso’s hourly rate: AECA is requesting an hourly rate of \$155 for Ms. Olhasso in 2016, 2017, and 2018. She last received \$155 for work performed in 2016 (D.16-08-013). Her rate of \$155 for 2018 places her at the low end of the range for experts with 0 to 6 years of relevant experience (see Res. ALJ-352). She has approximately 6 years of relevant experience.
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D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
Ralph Nevis Hourly Rate	AECA requests an hourly rate of \$400 for Ralph Nevis (Nevis) in 2017. Nevis graduated from University of the Pacific, McGeorge School of Law in 1999, and has practiced before the Commission over the last ten years. We find the requested rate of \$400 reasonable and reflective of his experience level for work completed in 2017.
[1]	<p>AECA’s work after the issuance of the decision cannot be characterized as having assisted us in making our decision, which §1802(j) requires. We deny this portion of AECA’s request:</p> <ul style="list-style-type: none"> • 7/14/18 Olhasso – 1 hour for reviewing final decision • 7/20/18 Boccadoro – 1.25 hours for reviewing final decision
[2]	<p>AECA spent a combined 22 hours on Intervenor Compensation Claim Preparation. The Commission does not compensate attorneys for work that is clerical in nature as such work has been factored into the established rates. The following hours are disallowed from Trowbridge’s claim preparation as clerical: 1/9/17 – 0.1 hours “Arrange for filing and service of NOI” and 9/11/18– 0.5 hours “Attention to filing Icomp Request.”</p> <p>AECA has used the expedited forms available to Intervenor to simplify these tasks and is also experienced in the completion of compensation claims. We disallow 20% of Olhasso, Boccadoro, and Trowbridge’s hours in this category as excessive. We note that another Intervenor in this proceeding with a claim approximately 230% larger requested 24.8 hours on Intervenor Compensation Claim Preparation.</p>
[3]	<p>In accordance with the additional guidance provided by ALJ Cooke in the December 4, 2017 Ruling issued in R.17-06-015 on AECA’s Showing of Significant Financial Hardship, AECA shall provide information on the percentage of AECA members who are agricultural customers with annual electric bills below \$50,000.</p> <p>For purposes of this proceeding, AECA currently has 280 active individual</p>

	members (excluding agricultural associations and water district members); 178 of those members have electricity bills of less than \$50,000. As a result, AECA is seeking 64% (178÷280) of the total compensation found reasonable in this proceeding. Pursuant to the December 4, 2017 Ruling, the total award of \$41,800.75 found reasonable by the Commission shall be compensated at 64% for a total award of \$26,752.48.
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PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. Agricultural Energy Consumers Association has made a substantial contribution to D.18-07-006.
2. The requested hourly rates for Agricultural Energy Consumers Association's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$26,752.48.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Agricultural Energy Consumers Association shall be awarded \$26,752.48.
2. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay Agricultural Energy Consumers Association the total award. Payment of the award shall include compound interest at the rate earned on prime,

three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning November 25, 2018, the 75th day after the filing of Agricultural Energy Consumers Association's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, at Los Angeles, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision:	D1807006		
Proceeding:	A1609003		
Author:	ALJ Roscow		
Payer:	Southern California Edison Company		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Agricultural Energy Consumers Association (AECA)	9/11/18	\$26,609.92	\$26,752.48	N/A	<i>See</i> CPUC Disallowances and Adjustments, above.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Ann	Trowbridge	Attorney	\$405	2016	\$410
Ann	Trowbridge	Attorney	\$410	2017	\$420
Ann	Trowbridge	Attorney	\$415	2018	\$430
Ralph	Nevis	Attorney	\$400	2017	\$400
Richard	McCann	Expert	\$210	2016	\$215
Richard	McCann	Expert	\$215	2017	\$220
Steven	Moss	Expert	\$215	2016	\$225
Steven	Moss	Expert	\$215	2017	\$230
Michael	Boccadoro	Expert	\$210	2016	\$215
Michael	Boccadoro	Expert	\$215	2017	\$220
Michael	Boccadoro	Expert	\$215	2018	\$225
Beth	Olhasso	Expert	\$155	2016	\$155
Beth	Olhasso	Expert	\$155	2017	\$160
Beth	Olhasso	Expert	\$155	2018	\$165

(END OF APPENDIX)